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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**[PROPOSED] ORDER REGARDING
SEARCH STRINGS**

[PROPOSED] ORDER

Having considered the Parties' October 16, 2020 submissions regarding the search strings to be applied to the 38 custodians in Custodian Groups 1-4 (*see* Dkt. 461), IT IS HEREBY ORDERED as follows:

☐ Facebook's Proposal, attached as **Exhibit A** to its October 16, 2020 submission shall be adopted in full for the 38 custodians in Custodian Groups 1-4;

or

☐ The agreed-upon search strings as set out in **Exhibit B** to Facebook's October 16, 2020 submission shall be adopted for the 38 custodians in Custodian Groups 1-4 in addition to the following:

<i>Strings proposed by Facebook for which the Parties submit competing versions</i>		
FB - 12	Facebook's Proposal <input type="checkbox"/>	Plaintiffs' Proposal <input type="checkbox"/>
FB - 20	Facebook's Proposal <input type="checkbox"/>	Plaintiffs' Proposal <input type="checkbox"/>

<i>Strings proposed by Plaintiffs for which the Parties submit competing versions</i>		
P-236	Facebook's Proposal <input type="checkbox"/>	Plaintiffs' Proposal <input type="checkbox"/>
P-273	Facebook's Proposal <input type="checkbox"/>	Plaintiffs' Proposal <input type="checkbox"/>
P-290	Facebook's Proposal <input type="checkbox"/>	Plaintiffs' Proposal <input type="checkbox"/>
P-426	Facebook's Proposal <input type="checkbox"/>	Plaintiffs' Proposal <input type="checkbox"/>
P-466	Facebook's Proposal <input type="checkbox"/>	Plaintiffs' Proposal <input type="checkbox"/>
P-501	Facebook's Proposal <input type="checkbox"/>	Plaintiffs' Proposal <input type="checkbox"/>
P-669	Facebook's Proposal <input type="checkbox"/>	Plaintiffs' Proposal <input type="checkbox"/>

<i>Strings proposed by Plaintiffs that Facebook asks the Court to reject in full</i>		
P-41	Do Not Include <input type="checkbox"/>	Include <input type="checkbox"/>
P-117	Do Not Include <input type="checkbox"/>	Include <input type="checkbox"/>
P-118	Do Not Include <input type="checkbox"/>	Include <input type="checkbox"/>

P-194	Do Not Include <input type="checkbox"/>	Include <input type="checkbox"/>
P-216	Do Not Include <input type="checkbox"/>	Include <input type="checkbox"/>
P-223	Do Not Include <input type="checkbox"/>	Include <input type="checkbox"/>
P-244	Do Not Include <input type="checkbox"/>	Include <input type="checkbox"/>
P-313	Do Not Include <input type="checkbox"/>	Include <input type="checkbox"/>
P-422	Do Not Include <input type="checkbox"/>	Include <input type="checkbox"/>
P-458	Do Not Include <input type="checkbox"/>	Include <input type="checkbox"/>
P-467	Do Not Include <input type="checkbox"/>	Include <input type="checkbox"/>
P-481	Do Not Include <input type="checkbox"/>	Include <input type="checkbox"/>
P-673	Do Not Include <input type="checkbox"/>	Include <input type="checkbox"/>

The Court expects the search strings approved in this Order to serve as a starting point for the Parties' negotiations of the search strings to apply to the remaining 43 custodians.

IT IS SO ORDERED.

DATE: _____

United States Magistrate Judge Jacqueline Corley